

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRISHA PARAVAS,
Plaintiff,

-v-

DR. MORAN CERF,
Defendant.

No. 1:21-cv-07463 (RA) (BCM)

PERMANENT INJUNCTION UPON CONSENT

WHEREAS, Plaintiff Trisha Paravas commenced this action charging defendant Moran Cerf with negligence, battery, and intentional and negligent infliction of emotional distress; and

WHEREAS, Cerf answered the Complaint denying Paravas's allegations in this action and asserted counterclaims against Paravas alleging defamation; and

WHEREAS, all parties to this action have reached a confidential agreement to settle the controversy by, between, and among them, it is hereby ORDERED, ADJUDGED, AND DECREED:

1. That this Court has jurisdiction over the parties to this action, and over the subject matter of this action.

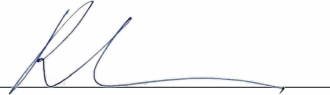
2. That the jurisdiction of this Court is retained for the purpose of making any further orders necessary or proper for the construction or modification of this Permanent Injunction Upon Consent, the enforcement thereof and the punishment of any violations thereof.

3. That Paravas shall be and hereby is permanently restrained and enjoined from making (or directly or indirectly ordering, requesting, or permitting any other person to make) any public or private statement or disclosure of any kind concerning any actual or alleged interactions between herself and Cerf, including the subject matter of this action, or concerning any term of confidential settlement agreement entered into between the parties.

4. That Cerf shall not testify as a witness nor direct or permit his counsel of record in this action to testify as a witness in any other proceeding in which Paravas is a party, absent a valid subpoena or court order requiring such testimony. In the event that Cerf or his counsel of record in this action receives such a subpoena or court order, they shall provide prompt notice to Paravas in order to allow her to seek to quash or otherwise challenge the enforcement of such subpoena or court order.

5. That this Permanent Injunction Upon Consent be entered without taxation of costs, damages or attorney fees to any of the parties hereto.

SO ORDERED.

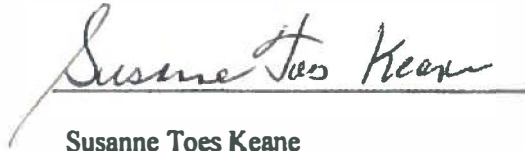

Hon. Ronnie Abrams
April 8, 2022

Consents:

The undersigned parties consent to the entry of the foregoing Permanent Injunction Upon Consent

TRISHA PARAVAS

By: NEW YORK LEGAL ASSISTANCE
GROUP



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MORAN CERF

By: CLARICK GUERON REISBAUM LLP



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Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, plaintiff Trisha Paravas and defendant Dr. Moran Cerf, by and through their counsel of record, hereby stipulate to the dismissal of this action with prejudice. Both parties withdraw their allegations of unlawful conduct and have settled their dispute to their mutual satisfaction. Each party is to bear its own costs and attorneys' fees. A brief statement by plaintiff concerning the subject matter of this action is appended hereto.

Dated: New York, New York
_____, 2022

TRISHA

By

CHUCK GUERON EISBAUM LLP

By:

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